

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ACR SYSTEMS, INC.,

Plaintiff,

v.

WOORI BANK,

Defendant.

JUDGE BRICCETTI

Case No. **14 CV 2817**

**NOTICE OF REMOVAL OF
ACTION PURSUANT TO
28 U.S.C. § 1332 (DIVERSITY OF
CITIZENSHIP JURISDICTION)**

TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT OF NEW YORK AND TO PLAINTIFF:

PLEASE TAKE NOTICE that defendant Woori Bank ("Defendant"), by and through counsel, and subject to all of its defenses, including any and all Rule 12 defenses, hereby provides notice of the removal to the United States District Court for the Southern District of New York, of the following lawsuit filed February 10, 2014 in the Supreme Court of the State of New York, County of Westchester: *ACR Systems, Inc. v. Woori Bank*, Case No. 051941/2014. The following is a short, plain statement of the grounds for removal. See 28 U.S.C. § 1446(a).

I. DESCRIPTION OF THE ACTION

1. On May 9, 2013, plaintiff ACR Systems, Inc. ("Plaintiff" or "ACR") filed in the Supreme Court of the State of New York, Westchester County, a complaint against Defendant, which is neither incorporated nor residing in the State of New York. ACR alleges in the Complaint that it is a foreign corporate entity with a principal place of business in Texas and authorized to do business in New York State. A copy of the Complaint is attached hereto as **Exhibit A**. The Complaint alleges that Plaintiff is owed money from Defendant pursuant to a

letter of credit issued by Defendant on behalf of non-party Woong Kook. The Complaint additionally alleges that Plaintiff is owed money from Defendant because “as a direct consequence of the Defendant’s failure to honor the Letter of Credit obligations it had to the Plaintiff, Plaintiff’s contracts ... with Woong Kook were cancelled resulting in a loss to the Plaintiff....” The Complaint seeks \$322,232.97, applicable interest, costs and disbursement.

II. BASIS FOR REMOVAL (DIVERSITY JURISDICTION)

2. Removal of the Plaintiff’s claim under 28 U.S.C. §§ 1441(a) and (b) is appropriate because this Court has original jurisdiction given that the amount in controversy exceeds \$75,000.00, exclusive of interest and costs, and is between (1) citizens of different States; (2) citizens of a State and citizens of subjects of a foreign state; and/or (3) citizens of different States and in which citizens or subjects of a foreign state are additional parties. Specifically, Plaintiff alleges that it resides in the State of Texas. *See Exhibit A* hereto. The Defendant is not incorporated under the laws of, nor has its principal place of business in, the State of New York.

3. Specifically, Defendant is a Korean company with its principal place of business in Seoul, South Korea.

III. THE NOTICE OF REMOVAL IS PROCEDURALLY PROPER

4. Based on the foregoing, this action is a civil action over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and is one that may be removed to this Court pursuant to 28 U.S.C. §§ 1441 and 1446. Venue is proper in the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. § 1446 because the state court action is pending within the Supreme Court of the State of New York, Westchester County. In accordance with the requirements of 28 U.S.C. § 1446(a), a copy of the Complaint and all other papers served on Defendant in the state court action as of the filing of this Notice of Removal are

attached hereto in **Exhibit A**. This Notice of Removal is filed within the time provided by 28 U.S.C. § 1446(b) because it has been filed within thirty (30) days after Defendant was served with a copy of the initial pleading in this action.

5. Without waiving any objections to personal jurisdiction, all Defendants consent to this removal.

CONCLUSION AND REQUESTED RELIEF

For all of the reasons set forth above, without waiving any defenses to the claims asserted by Plaintiff, including personal jurisdiction, Defendant respectfully requests that this Court proceed with this matter as if it had been originally filed herein.

Dated: New York, New York
April 18, 2014

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: _____


Robert S. Friedman
Rena Andoh

30 Rockefeller Plaza
New York, New York 10112-0015
Telephone: (212) 634-3092
Facsimile: (212) 655-1721
rfriedman@sheppardmullin.com
randoh@sheppardmullin.com

Attorneys for Defendant

Exhibit A



NYSCEF - Westchester County Supreme Court Confirmation Notice

This is an automated response for Supreme Court / Court of Claims cases. The NYSCEF site has received your electronically filed document(s) for:

ACR Systems, Inc. - v. - Woorl Bank

Index Number NOT assigned

Documents Received

| Doc # | Document Type | Motion # | Date Received |
|-------|---------------|----------|---------------------|
| 1 | SUMMONS | | 02/10/2014 10:10 AM |
| 2 | COMPLAINT | | 02/10/2014 10:10 AM |
| 3 | EXHIBIT(S) A | | 02/10/2014 10:10 AM |

Filing User

| | | | |
|--------|------------------|-----------------|-----------------------|
| Name: | JOHN EDWARD CONE | E-mail Address: | JCone@jconelaw.com |
| Phone | | Work Address: | 2 ASCOT CIRCLE |
| Fax #: | | | MOUNT KISCO, NY 10549 |

E-mail Notifications

An e-mail notification regarding this filing has been sent to the following address(es) on
02/10/2014 10:10 AM:

CONE, JOHN EDWARD - JCone@jconelaw.com

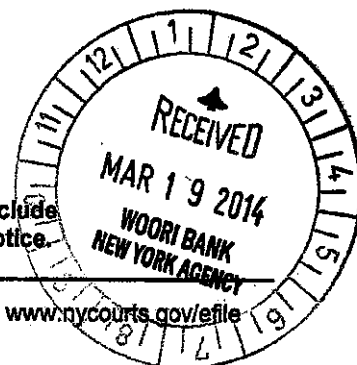
NOTE: If submitting a working copy of this filing to the court, you must include as a notification page firmly affixed thereto a copy of this Confirmation Notice.

E-mail: EFile@nycourts.gov

Phone: (646) 386-3033

Fax: (212) 401-9146

website: www.nycourts.gov/efile



FILED: WESTCHESTER COUNTY CLERK 02/10/2014

NYSCEF DOC. NO. 1

INDEX NO. 51941/2014

RECEIVED NYSCEF: 02/10/2014

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER X

ACR Systems, Inc.

Plaintiff,

SUMMONS

V.

Index No.

Woori Bank

Defendant **X**

To the above named Defendant:

You are hereby summoned to Answer the Complaint in this Action and to serve a copy of your Answer on the Plaintiff's Attorneys within 20 days after service of this Summons and attached Complaint (or within 30 days after the service is complete if this Summons and attached Complaint are not personally delivered to you within the State of New York); and in case of your failure to Appear or Answer, Judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: January 30, 2014

The Law Office of John E. Cone Jr.
2 Ascot Circle
Mount Kisco, New York 10549
Tel.: 914 481 6249
Fax.: 914 461 3228

to be made by and as part of an irrevocable Letter of Credit numbered MD1G8012GU00032 dated December 28, 2010 issued in favor of ACR by Defendant, Woori Bank on behalf of Woong Kook. A copy of the advice of the said Irrevocable Letter of Credit as recently received from the Defendant is attached hereto as Exhibit "A".

- (6) The aforementioned contract was further confirmed, in writing, by a signed "PURCHASE ORDER SHEETS" dated January 10/11, 2011 which called for payment by means of the above mentioned, irrevocable letter of credit.
- (7) In or about February 2012, the subject goods were delivered at Houston, Texas for shipment to Pusan, Korea. On or about February 23, 2012, the subject military goods were laden on board the M/V *HJ Hamburg V* for such ocean transport to Korea where the shipment was ultimately delivered as specified by the said Woong Kook.
- (8) Despite the shipment and delivery of all of the subject goods specified in the above contract and the fact that the goods were to be paid for, in full, by means of the aforementioned Letter of Credit issued by the Defendant, the Plaintiff was only reimbursed \$28,099.11 by the Defendant and thus \$57,762.89 remains unpaid.
- (9) Additionally, all of the terms, preconditions and requirements of the subject letter of credit have been and were timely complied with by the Plaintiff. The Defendant has been duly given all documentation and information needed to make payment, in full, of the aforementioned invoice of \$85,862.00.
- (10) Plaintiff has made repeated, written demand on Defendant for payment but without success. Plaintiff has also made requests of the Defendant that it be supplied with a complete copy of the Letter of Credit - including its expiration date together with the expiration date of numerous amendments/extensions thereto - and the Defendant has not complied with these requests.

AS AND FOR A SECOND CAUSE OF ACTION

- (11) The Plaintiff repeats, reiterates and realleges each and every allegation contained in Paragraphs 1 through 10, inclusive as if fully set forth herein.
- (12) Plaintiff also repeatedly advised the Defendant, in writing, that its failure to pay as specified herein above would lead to potential contract frustrations/cancellations with Woong Kook of additional military items that were the subject of further existing contracts which were to be paid for by means of the same, irrevocable Letter of Credit mentioned above - (MD1G8012GU00032) - issued by the Defendant; that certain unpaid items that had been shipped should

be returned by the Defendant to the Plaintiff; and that unique military items had already been manufactured in accordance with the contracts and were waiting to be shipped from the United States.

- (13) Defendant either wholly ignored these repeated communications from the Plaintiff or deliberately and intentionally responded in unintelligible ways by fundamentally confusing the facts or stating contractual provisions that were, as Defendant knew, irrelevant to the issue of payment under the terms of the applicable Letter of Credit. A representative of the Plaintiff even travelled to Korea to attempt to work out a solution with the Defendant, to no avail. Travel expenses of this trip amounted to \$4,500.00. These travel expenses were incurred by the Plaintiff as a direct consequence of Defendant's actions as set forth herein. Plaintiff also incurred, as direct consequence of the Defendant's failure to honor the aforementioned Letter of Credit, legal fees in Korea amounting to \$5,500.00 and storage costs of the military items amounting to \$4,200.00. These additional damages amount to \$14,200.00.
- (14) As the direct consequence of the Defendant's failure to honor the Letter of Credit obligations it had to the Plaintiff, Plaintiff's contracts KFX-DAPA-01AD08C43; KFX-DAPA-01AD08C42; KFX-DAPA-01AD08C87; and KFX-DAPA-01AD08C35 with Woong Kook were cancelled resulting in a loss to the Plaintiff of \$250,270.08. All the items pursuant to these contracts were military items that were unique to these contracts and could not be sold elsewhere by the Plaintiff. Other expenses incurred by the Plaintiff as a direct consequence of the Defendant's illegal failure to honor its Letter of Credit include inventory, storage and travel expenses. Total damages, inclusive of the \$57,762.89 specified in paragraph "8" above, amount to \$308,032.97 plus the \$14,200.00 specified in Paragraph 13 herein leading to total damages of \$322,232.97.

AS AND FOR A THIRD ALTERNATIVE CAUSE OF ACTION

- (15) Plaintiff repeats, reiterates and realleges each and every allegation contained in Paragraphs (1) through (14) hereof as if fully set forth herein.
- (16) Plaintiff has demanded that Defendant return the military items that it owns and that were shipped and not paid for under contract DAPA-01AD08C56 specified herein in Paragraph (5) as it was entitled to. Defendant, ignoring its obligation to return these items, has not returned these items to the Plaintiff. Plaintiff, as best as now

can be ascertained, has incurred monetary damages amounting to \$57,762.89 as the result of Defendant's failure to return these items.

WHEREFORE, Plaintiff, ACR, demands Judgment in its favor against Defendant, Woori Bank, on the First Cause of Action in the amount of \$57,76.89, demands Judgment on the Second Cause of Action in the amount of \$264,470.08 and demands Judgment in the Third Cause of Action of \$57,762.89 for a total of \$322,232.97 together with applicable interest, court costs and such further relief as this Court may deem just and proper.

Dated: January 30, 2014
Mount Kisco, N.Y.



The Law Office of John E. Cone Jr.
2 Ascot Circle
Mount Kisco, N.Y. 10549
Tel.: (914) 481 6249
Fax.: (914) 461 3228

FILED: WESTCHESTER COUNTY CLERK 02/10/2014

NYSCEF DOC. NO. 3

INDEX NO. 51941/2014

RECEIVED NYSCEF: 02/10/2014

SWIFT INCOMING MESSAGE

| | |
|-----------------------------|----------------|
| 2010-12-28 | 2010-12-28 |
| MT700 | MT700 |
| HVBKUS333(WOORI BANK SEOUL) | |
| | ASUS0000000001 |

:27: Sequence of Total
 1/1
 :40A: Form of Documentary Credit
 IRREVOCABLE
 :20: Documentary Credit Number
 MD1G8012GU00032
 :31C: Date of Issue
 101228
 :40E: Applicable Rules
 UCPURR LATEST VERSION
 :31D: Date and Place of Expiry
 120430IN BENEFICIARY'S COUNTRY
 :50: Applicant
 WOONG KOOK CORP
 CROSS CASTLE BLDG 918 6 Hwagok-dong
 Gangseo-gu Seoul Korea
 :52: Beneficiary
 ARC SYSTEMS INC. 10 N INTERSTATE
 35 AUSTIN, TEXAS 78701
 TEL:832-818-3360
 FAX NO.832-818-3361
 :32B: Currency Code, Amount
 USD176155.50
 :39B: Maximum Credit Amount
 NOT EXCEEDING
 :41D: Available With ... By ...
 ANY BANK
 BY NEGOTIATION
 :42C: Drafts at ...
 060 DAYS AFTER SIGHT
 :42A: Drawee
 HVBKUS33 : WOORI BANK, NEW YORK
 :43P: Partial Shipments
 ALLOWED
 :43T: Transhipment
 PROHIBITED
 :44E: Port of Loading/Airport of Departure
 HOUSTON SEAPORT USA
 :44F: Port of Discharge/Airport of Destination
 BUSAN PORT KOREA
 :44C: Latest Date of Shipment
 120331
 :45A: Description of Goods and/or Services
 NO. description P/N
 QTY(EA) UNIT PRICE AMOUNT(USD)
 10 /MIST ELIMINATOR 369D290125-21
 9 1,379.00 12,411.00
 72 PANEL ASSY 416-362
 5 2,863.00 14,315.00
 102 PANEL CIRCUIT BREA 423-093-3
 20 1,140.00 22,800.00
 125 COUPLING,M/R SHAFT 359A5501
 19 5,600.00 106,400.00
 135 DUCT,AFTER CABIN 369D292475
 6 955.00 5,730.00
 180 ARM ASSY (MAG) 369A7716
 3 840.00 2,520.00
 234 HARNESS ASSY ENGIN 369D24105
 13 921.50 11,979.50
 TOTAL USD 176,155.50

2013-11-15 15:054

Page: 1/2

EXHIBIT A

SWIFT INCOMING MESSAGE

| | | | |
|-----------------------|-------------------------------|---------------------|-----------------|
| RECEIVING SYSTEM DATE | 2010-12-28 | BUSINESS APPLY DATE | 2010-12-28 |
| | MT700 | THEIR REFERENCE NO | MD1G8012GU00032 |
| SENDING BANK | HVBKRRSEXXX(WOORI BANK SEOUL) | | |
| UCNO | | OUR REFERENCE NO | ADV9031000351 |
| MESSAGE TEXT | | | |

FCA/HOUSTON SEAPORT
 ORIGIN USA
 :46A: Documents Required
 +FULL SET OF CLEAN on Board Ocean Bills of Lading made out to the
 order of DEFENSE TRANSPORTATION COMMAND BUSAN REPUBLIC OF KOREA
 Freight Collect and notify DEFENSE ACQUISITION PROGRAM ADMINISTRA
 TION 2-15 YONGSANDONG 2-GA YONGSAN-GU SEOUL KOREA
 +Signed commercial invoice in ORG(3), COPY(5)
 +Packing list in ORG(3), COPY(5)
 +Certificate of origin in 3 issued by USA
 +Inspection certificate in ORG(3), COPY(5) issued by Manufacturer
 +INSPECTION ACCEPTANCE CERTIFICATE ISSUED BY DAPA
 +Certificate of analysis in ORG(3), COPY(5)
 :47A: Additional Conditions
 +DRAFTS ARE TO BE MARKED AS DRAWN UNDER THIS DOCUMENTARY CREDIT
 +T/T REIMBURSEMENT IS NOT ALLOWED
 +IF DOCUMENTS CONTAINING DISCREPANCIES ARE PRESENTED,
 A FEE OF USD80 SHOULD BE DEDUCTED FROM
 THE REIMBURSEMENT CLAIM. NOTWITHSTANDING ANY
 INSTRUCTION TO THE CONTRARY,
 THIS FEE SHOULD BE CHARGED TO THE BENEFICIARY.
 THIS CREDIT IS SUBJECT TO THE ICC UCP600 AND URR LATEST VERSION.
 REIMBURSEMENT MUST BE CLAIMED STATING COMMODITY,
 PORT OF LOADING AND PORT OF DISCHARGE.
 AN EXTRA COPY OF ALL DOCUMENTS IS REQUIRED FOR
 ISSUING BANK'S FILE
 :71B: Charges
 ALL BANKING CHARGES OUTSIDE KOREA
 ARE FOR ACCOUNT OF BENEFICIARY
 +REIMBURSEMENT CHARGES ARE FOR
 ACCOUNT OF BENEFICIARY
 :49: Confirmation Instructions
 WITHOUT
 :53A: Reimbursing Bank
 HVBKUS33 : WOORI BANK, NEW YORK
 :78: Instructions to the Paying/Accepting/Negotiating Bank
 TO PAY /ACC/NEG/ BK :
 THE AMOUNT OF EACH DRAFT MUST BE ENDORSED
 ON THE REVERSE OF THIS CREDIT
 +ALL DOCUMENTS MUST BE FORWARDED TO US BY
 COURIER SERVICE IN ONE LOT. ADDRESSED TO
 WOORI BANK
 1585 SANGAM-DONG MAPO-GU SEOUL KOREA
 +REIMBURSE YOURSELVES ON THE REIMBURSING BANK AT SIGHT BASIS.
 ACCEPTANCE COMM AND DISCOUNT CHGS ARE FOR ACCOUNT OF APPLICANT.

Message Output Reference : 01:35-2010/12/30-HVBKUS33AXXX-0264-298838
 Correspondent Input Reference : 15:35-2010/12/30-HVBKRRSEAXXX-0004-768160

----- Message Header -----

FIN 707 Amendment to a Doc Credit

Sender : HVBKRRSEXXX
 WOORI BANK, SEOUL
 SEOUL

Receiver : HVBKUS33XXX
 WOORI BANK, NEW YORK
 NEW YORK, NY

FIN Copy :
 MUR : B200780000100A

Validation Flag :
 Banking Priority :

----- Message Text -----

20 / Sender's Reference : MD1G8012GU00032
 21 / Receiver's Reference : NONREF
 31C/ Date of Issue : 10/12/28
 30 / Date of Amendment : 101230
 26E/ Number of Amendment : 01
 59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
 35 AUSTIN, TEXAS 78701
 TEL:832-818-3360
 FAX NO.832-818-3361
 32B/ Increase of Doc Credit Amt : USD #23,844.50#
 34B/ New Doc Credit Amt After Amd : USD #200,000.00#
 39B/ Maximum Credit Amount : NOT EXCEEDING
 79 / Narrative
 3) KFX-DAPA-01AD08C43 6) KFX-DAPA-01AD08C35
 7) KD02AD08B94 8) KD03FD08C09
 FCA/HOUSTON SEAPORT
 ORIGIN USA
 72 / Sender to Receiver Information : THIS CREDIT IS SUBJECT TO UCP
 FOR DOC. CR. 2007 (REVISION)
 PUBLICATION 600.ICC

----- Message Trailer -----

XDT/ Global Date/Time : 2010/12/30 15:35

----- End of Report -----

Total : 8/8

Page : 1/1

<Incoming Message>

Printed stamp : 2013-11-20 14:18:47

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----- Transmission -----
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Received from              : SWIFT
Network Priority           : Normal
Message Output Reference   : 03:28-2011/01/11-HVBKUS33AXXX-0265-303517
Correspondent Input Reference : 17:28-2011/01/11-HVBKKRSEAXXX-0004-835915
----- Message Header -----

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FIN 707 Amendment to a Doc Credit

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Sender :      HVBKKRSEXXX
           WOORI BANK, SEOUL
           SEOUL

Receiver :    HVBKUS33XXX
           WOORI BANK, NEW YORK
           NEW YORK,NY

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FIN Copy :
MUR : B200780000200A

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Validation Flag :
Banking Priority :

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----- Message Text -----
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31C/ Date of Issue           : 10/12/28
30 / Date of Amendment       : 110111
26E/ Number of Amendment    : 02
59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
                                   35 AUSTIN, TEXAS 78701
                                   TEL:832-818-3360
                                   FAX NO.832-818-3361

```

79 / Narrative

```

+46A
DELETE)
+Certificate of origin in 3 issued by USA
+Certificate of analysis in ORG(3),COPY(5)
+47A
BEFORE)
+T/T REIMBURSEMENT IS NOT ALLOWED
AFTER)
+T/T REIMBURSEMENT IS ALLOWED
+45A

```

BAD80007-001

| No | NSN | Part No |
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| Description | | Qty |
| 10 | 156037A002848 | 369D290125-21 |
| /IMIST ELIMINIATOR | | 9 |
| 16 | 156037A004515 | 369A8442-3 |
| LATCH ASSY | | 54 |
| 30 | 156037A010790 | 369H92128 |
| DUCT ASSY | | 13 |
| 31 | 156037A010796 | 369D28302-11 |
| DUCT ELBOW OIL COO | | 6 |
| 33 | 156037A010799 | 369A8404 |
| DUCT SEPARATION | | 1 |
| 47 | 156037A017912 | 369H6625 |
| TEE | | 26 |

Page : 1/2

| | | |
|--------------------|---------------|---------------|
| 50 | 156037A018138 | 369D290009-51 |
| CASE ASSY | | 17 |
| 55 | 156037A018294 | 369H2053-2 |
| HINGE | | 14 |
| 63 | 156037A019435 | 369D22008-37 |
| FIREWALL PANEL | | 83 |
| 65 | 156037A019443 | 369D22008-20 |
| FIREWALL PANEL | | 86 |
| 72 | 156037A022408 | 416-362 |
| PANEL ASSY | | 5 |
| 79 / Narrative | | |
| 102 | 156037A145170 | 423-093-3 |
| PANEL CIRCUIT BREA | | 20 |
| 108 | 156037A151003 | 369D294383-11 |
| TERMINAL BOARD RKT | | 6 |
| 125 | 161537A004223 | 369A5501 |
| COUPLING,M/R SHAFT | | 19 |
| 127 | 161537A005576 | 369H6629 |
| ADAPTER 3-16 TUBE | | 95 |
| 135 | 161537A010684 | 369D292475 |
| DOCT,APTER CABIN | | 6 |
| 158 | 162037A004502 | M50032-7 |
| L/G DAMPER KIT OVH | | 430 |
| 165 | 165037A003958 | 369H6457-21 |
| WARMING | | 15 |
| 166 | 165037A005814 | 369H6312 |
| DAMPER | | 90 |
| 180 | 168037A007053 | 369A7716 |
| ARM ASSY (MAG) | | 3 |
| 185 | 168037A018266 | 369D297122-12 |
| GUARD | | 6 |
| 196 | 168037A078834 | 369A2030-33 |
| SEAL | | 39 |
| 207 | 173037A004500 | 369D25303 |
| COVER INPUT4T/R BE | | 21 |
| 233 | 284037A017880 | 369D24110 |
| WIRE HARNESS | | 6 |
| 234 | 284037A018283 | 369D24105 |
| HARNESS ASSY ENGIN | | 13 |
| 255 | 3040009228228 | 369A7613-1 |
| CONNECTING LINK,RI | | 35 |
| 262 | 304037A252347 | 2529242(H) |
| GEARSHAFT | | 24 |

++++++1/5 ++++++TO BE CONTINUE++++++

72 / Sender to Receiver Information : THIS CREDIT IS SUBJECT TO UCP
FOR DOC. CR. 2007 (REVISION)
PUBLICATION 600.ICC

----- Message Trailer -----
XDT/ Global Date/Time : 2011/01/11 17:28
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Printed stamp : 2013-11-20 14:18:47

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 Correspondent Input Reference : 17:28-2011/01/11-HVBKKRSEAXXX-0004-835918

----- Message Header -----

FIN 707 Amendment to a Doc Credit
 Sender : HVBKKRSEXXX
 WOORI BANK, SEOUL
 SEOUL
 Receiver : HVBKUS33XXX
 WOORI BANK, NEW YORK
 NEW YORK, NY

FIN Copy :
 MUR : T200840000400M

Validation Flag :
 Banking Priority :

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 21 / Receiver's Reference : .
 26E/ Number of Amendment : 00
 59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
 35 AUSTIN, TEXAS 78701
 TEL:832-818-3360
 FAX NO.832-818-3361

79 / Narrative

| | | |
|---------------------|---------------|-----------------|
| 408 | 533037A010828 | 369D294924-5 |
| SEAL | | 80 |
| 441 | 536037A021055 | 369H92133-3 |
| SPRING DAMPER | | 49 |
| 452 | 536537A004270 | 369H2025-908 |
| RETAINER | | 34 |
| 457 | 536537A017157 | 369D25641 |
| SHIM | | 38 |
| 467 | 536537A147181 | 369A8017 |
| RETAINER | | 10 |
| 480 | 593537A002860 | ZY400-1-2-OR |
| CONNECTOR | | 117 |
| 483 | 593537A038220 | NYAND4-1-1/2-20 |
| REDUCER | | 32 |
| 505 | 614537A252367 | 369D24108 |
| WIRE HARNESS | | 3 |
| BAD80501-001 | | |
| No | NSN | Part No |
| Description | Qty | |
| 2 | 100537A006283 | 41897411 |
| CHUTE, EJECTION | 12 | |
| 29 | 1560012255611 | 70209-63003-108 |
| SEAL | 11 | |
| 118 | 4720013856596 | 145H1808-5 |
| TUBING, NONMETALLIC | 5 | |
| 135 | 5305009895002 | 5305009895002A |
| SCREW, MACHINE | 405 | |

143 5310008822239 2-300-303-01
NUT, SELF-LOCKING, E 7
147 531037A135149 369D294370-701
COAX CABLE ASSY 6

+++++3/5+++++TO BE CONTINUE+++++

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XDT/ Global Date/Time : 2011/01/11 17:28
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Page : 2/2

Total : 6/8

<Incoming Message>

Printed stamp : 2013-11-20 14:18:46

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 Received from : SWIFT
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 Correspondent Input Reference : 17:28-2011/01/11-HVBKKRSEAXXX-0004-835919
 Message Header -----

FIN 707 Amendment to a Doc Credit

Sender : HVBKKRSEXXX
 WOORI BANK, SEOUL
 SEOUL

Receiver : HVBKUS33XXX
 WOORI BANK, NEW YORK
 NEW YORK, NY

FIN Copy :

MUR : T200840000500M

Validation Flag :

Banking Priority :

----- Message Text -----
 20 / Sender's Reference : MD1G8012GU00032
 21 / Receiver's Reference : .
 26E/ Number of Amendment : 00
 59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
 35 AUSTIN, TEXAS 78701
 TEL:832-818-3360
 FAX NO.832-818-3361

79 / Narrative

| | | |
|--------------------|---------------|--------------|
| 164 | 5330013752654 | 11486002-182 |
| SEAL, PLAIN | 3 | |
| 166 | 5330014764037 | 1-300-689-01 |
| GASKET | 34 | |
| 184 | 5340015314147 | 11482915-74 |
| LEAF, BUTT HINGE | 12 | |
| 203 | 589537A003952 | 369D294521 |
| L-BAND AN TENNA | 8 | |
| 226 | 599537A232242 | 11486058-19 |
| CABLE | 4 | |
| 245 | 5998014515892 | 1D75133-511 |
| CIRCUIT CARD ASSEM | 1 | |
| 259 | 601537A025441 | 421-013-715 |
| CABLE ASSY | 16 | |
| 277 | 615037A017671 | 421-013-717 |
| CABLE ASS'Y | 5 | |
| 278 | 615037A123659 | 11830973 |
| CABLE ASSEMBLY | 1 | |
| BAD80951-001 | | |
| No | NSN | Part No |
| Description | | Qty |
| 25 | 591537A122189 | 41897626 |
| ADAPTER | | 12 |
| 34 | 594537A126919 | 41897817 |
| RELAY ASSY | | 5 |
| 49 | 9920009996753 | |
| LIGHT | | 130 |

+++++4/5+++++TO BE CONTINUE+++++

----- Message Trailer -----
XDT/ Global Date/Time : 2011/01/11 17:28
----- End of Report -----

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Total : 4/8

<Incoming Message>

Printed stamp : 2013-11-20 14:18:46

----- Transmission -----
 Authentication Result :
 Received from : SWIFT
 Network Priority : Normal
 Message Output Reference : 03:28-2011/01/11-HVBKUS33AXXX-0265-303519
 Correspondent Input Reference : 17:28-2011/01/11-HVBKKRSEAXXX-0004-835917

----- Message Header -----
 FIN 707 Amendment to a Doc Credit
 Sender : HVBKKRSEXXX
 WOORI BANK, SEOUL
 SEOUL
 Receiver : HVBKUS33XXX
 WOORI BANK, NEW YORK
 NEW YORK, NY

FIN Copy :
 MUR : T200840000300M

Validation Flag :
 Banking Priority :

----- Message Text -----
 20 / Sender's Reference : MD1G8012GU00032
 21 / Receiver's Reference : .
 26E/ Number of Amendment : 00
 59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
 35 AUSTIN, TEXAS 78701
 TEL:832-818-3360
 FAX NO.832-818-3361

79 / Narrative
 267 311037A024118 HS626S4-500
 BUSHING 96
 268 311037A024122 369H5308
 BUSHING 198
 271 3120011681686 369A7951-55
 BEARING, PLAIN, ROD 126
 275 312037A002856 369A1716-3
 2.4T/R BEARING INN 146
 278 312037A003916 369A1716-5
 2T/R BEARING OUTER 18
 281 312037A008281 369A5361
 BEARING 56
 293 472037A010801 369D292495
 DUCT, HEATING 48
 294 472037A152576 369D25711
 TUBE ASSY 11
 301 473037A003426 369A6501-5
 TUBE 13
 305 473037A003982 369H6610-9
 TUBE 24
 307 473037A004503 369A6200-45
 L/H AFT L/G FILLET 3
 308 473037A017772 369D292503
 HOSE 14
 313 473037A018051 369A6200-46
 FILLET ASSY AFT RH 2
 316 473037A018467 369A8010-691

NEW TOQ TUBE FIRE 17
322 473037A045214 369H8407
TUBE COMPRESSOR BL 22
381 531537A019465 369D21725-3
NUT STOP SUPPORT 2 21
+++++2/5 +++++TO BE CONTINUE+++++

----- Message Trailer -----
XDT/ Global Date/Time : 2011/01/11 17:28
----- End of Report -----

Page : 2/2

Total : 5/8

<Incoming Message>

Printed stamp : 2013-11-20 14:18:46

----- Transmission -----
 Authentication Result :
 Received from : SWIFT
 Network Priority : Normal
 Message Output Reference : 03:28-2011/01/11-HVBKUS33AXXX-0265-303522
 Correspondent Input Reference : 17:28-2011/01/11-HVBKKRSEAXXX-0004-835920
 ----- Message Header -----

FIN 707 Amendment to a Doc Credit
 Sender : HVBKKRSEXXX
 WOORI BANK, SEOUL
 SEOUL
 Receiver : HVBKUS33XXX
 WOORI BANK, NEW YORK
 NEW YORK, NY

FIN Copy :
 MUR : T200840000600M

Validation Flag :
 Banking Priority :

----- Message Trailer -----
 20 / Sender's Reference : MD1G8012GU00032
 21 / Receiver's Reference : .
 26E / Number of Amendment : 00
 59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
 35 AUSTIN, TEXAS 78701
 TEL:832-818-3360
 FAX NO.832-818-3361

79 / Narrative

| | | |
|----------------------|---------------|--------------|
| BBD80011-001 | | |
| No | NSN | Part No |
| Description | | Qty |
| 8 | 253037A142803 | 2830079-1 |
| IMAGE TUBE ASSY | | 14 |
| DFD80500-00 | | |
| No | NSN | Part No |
| Description | | Qty |
| 52 | 5895013901506 | QPD-30 |
| DETECTOR, RADIO FREQ | | 2 |
| PAD80001-002 | | |
| No | NSN | Part No |
| Description | | Qty |
| 40 | 5305991111167 | EF091-05028A |
| SCREW, CLOSE TOLERAN | | 13 |
| 183 | 751037Y958721 | C9363W |
| TRI-COLOR CARTRIDGE | | 50 |

+++++5/5+++++THE END+++++

----- Message Trailer -----
 XDT/ Global Date/Time : 2011/01/11 17:28
 ----- End of Report -----

Total : 3/8

<Incoming Message>

Printed stamp : 2013-11-20 14:18:46

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----- Transmission -----
Authentication Result      :
Received from              : SWIFT
Network Priority           : Normal
Message Output Reference   : 07:47-2011/06/21-HVBKUS33AXXX-0318-369781
Correspondent Input Reference : 12:47-2011/06/21-HVBKKRSEAXXX-0005-820385
----- Message Header -----
FIN 707 Amendment to a Doc Credit
Sender : HVBKKRSEXXX
        WOORI BANK, SEOUL
        SEOUL
Receiver : HVBKUS33XXX
        WOORI BANK, NEW YORK
        NEW YORK,NY

FIN Copy :
MUR : B200780000700A
Validation Flag :
Banking Priority :
----- Message Text -----
20 / Sender's Reference      : MD1G8012GU00032
21 / Receiver's Reference    : NONREF
31C/ Date of Issue          : 10/12/28
30 / Date of Amendment      : 110621
26E/ Number of Amendment    : 03
59 / Beneficiary (before Amendment) : ARC SYSTEMS INC. 10 N INTERSTATE
                                   35 AUSTIN, TEXAS 78701
                                   TEL:832-818-3360
                                   FAX NO.832-818-3361
32B/ Increase of Doc Credit Amt : USD #172,999.62#
34B/ New Doc Credit Amt After Amd : USD #372,999.62#
72 / Sender to Receiver Information : THIS CREDIT IS SUBJECT TO UCP
                                   FOR DOC. CR. 2007 (REVISION)
                                   PUBLICATION 600.ICC
----- Message Trailer -----
XDT/ Global Date/Time      : 2011/06/21 21:47
----- End of Report -----

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Total : 2/8

<Incoming Message>

Printed stamp : 2013-11-20 14:18:45

| | |
|-------------------------------------|---|
| ----- Transmission ----- | |
| Authentication Result | : |
| Received from | : SWIFT |
| Network Priority | : Normal |
| Message Output Reference | : 08:03-2012/04/30-HVBKUS33AXXX-0576-493162 |
| Correspondent Input Reference | : 15:45-2012/04/30-HVBKRSSEAXXX-0007-710838 |
| ----- Message Header ----- | |
| FIN 707 Amendment to a Doc Credit | |
| Sender : | HVBKRSSEXXX WOORI BANK, SEOUL SEOUL |
| Receiver : | HVBKUS33XXX WOORI BANK, NEW YORK NEW YORK,NY |
| FIN Copy : | |
| MUR : B200780000800A | Validation Flag : |
| | Banking Priority : |
| ----- Message Text ----- | |
| 20 / Sender's Reference | : MD1G8012GU00032 |
| 21 / Receiver's Reference | : NONREF |
| 31C/ Date of Issue | : 10/12/28 |
| 30 / Date of Amendment | : 120430 |
| 26Z/ Number of Amendment | : 04 |
| 69 / Beneficiary (before Amendment) | : ARC SYSTEMS INC. 10 N INTERSTATE 35 AUSTIN, TEXAS 78701 TEL:832-818-3360 FAX NO.832-818-3361 |
| 31E/ New Date of Expiry | : 12/09/27 |
| 44C/ Latest Date of Shipment | : 120827 |
| 72 / Sender to Receiver Information | : THIS CREDIT IS SUBJECT TO UCP FOR DOC. CR. 2007 (REVISION) PUBLICATION 600.ICC |
| ----- Message Trailer ----- | |
| XDT/ Global Date/Time | : 2012/04/30 22:03 |
| ----- End of Report ----- | |

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